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January 10, 2019

By ECF

Hon. Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 17A
New York, New York 1007

Re: *Carlos M. Salas et al. v. Peter Salas et al.*,
Case No. 16-cv-002248

Dear Magistrate Judge Freeman:

We write on behalf of defendants Peter E. Salas, Dolphin Advisors, LLC, Dolphin Asset Management Corp., Dolphin Direct Equity Partners, LP and Dolphin Management, Inc. (“Defendants”), to request an extension of time to file Defendants’ proposed findings of fact and conclusions of law. This document is currently scheduled to be filed on **January 18, 2019**. Defendants respectfully request a 7-day extension of time, up to and including **January 25, 2019**, to file their document. This is Defendants’ first request for an extension of time.

Defendants are not asking for additional time because settlement negotiations are ongoing, a circumstance that the Court suggested might be a basis for extending the filing date; rather, the press of business, the holidays, and the scope of the filing necessitate this request.

Counsel for plaintiffs Ada Cristina Salas and Carlos M. Salas has informed Defendants’ counsel that plaintiffs do not consent to this relief. Defendants’ counsel did not provide a reason for plaintiffs’ refusal to consent.

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Thank you for your consideration of this request.

Respectfully submitted,



Daniel A. Osborn